

## Attachment 4: Current Conservation Planning Requirements for Water System Plans (WSPs)

The following items need to be addressed and included in WSP comment letters.

Any conservation measures that have been part of the water system's past conservation efforts should be continued unless these efforts would be ineffective or their water conservation program prescribed it to end at a certain time or savings level.

### Water Use Reporting

Item	Comment	Authority	Reference
1	Provide a summary of historical average and peak water usage.	<ul style="list-style-type: none"> <li>– WAC 246-290-221(1)</li> <li>– WAC 246-290-480 (2)(e)(v)</li> </ul>	<ul style="list-style-type: none"> <li>– Memorandum of Understanding with Ecology (MOU)</li> <li>– Conservation Planning Requirements (pg.7)</li> <li>– Design Manual (5.3)</li> </ul>
2	Source meters are required. If the water system's sources are lacking a source meter, provide a schedule for installing a source meter within the next six years.	<ul style="list-style-type: none"> <li>– WAC 246-290-415(3) &amp; (5)</li> <li>– WAC 246-290-480 (1)(e)(v)</li> <li>– WAC 173-173-040</li> <li>– WAC 246-290-130(4)(g)</li> </ul>	<ul style="list-style-type: none"> <li>– MOU</li> <li>– Conservation Planning Requirements (pg.16, 17)</li> <li>– Planning Handbook (pg.19)</li> </ul>
3	Provide a breakdown of the system's unaccounted for water. The breakdown should identify the difference between the total unaccounted for water and the non-revenue water that can be identified (or estimated).	<ul style="list-style-type: none"> <li>– RCW 90.44.110</li> <li>– RCW 90.03.005</li> <li>– WAC 246-290-480(2)(e)(v)</li> </ul>	<ul style="list-style-type: none"> <li>– MOU</li> <li>– Conservation Planning Requirements (pg.8, 15)</li> <li>– Planning Handbook (pg.19)</li> </ul>
4	If unaccounted for water is 20% or greater, provide a plan to decrease it.	<ul style="list-style-type: none"> <li>– RCW 90.03.005</li> <li>– RCW 90.03.400</li> <li>– RCW 90.44.110</li> <li>– WAC 246-290-415(3) &amp; (5)</li> </ul>	<ul style="list-style-type: none"> <li>– MOU</li> <li>– Conservation Planning Requirements (pg.15)</li> <li>– Planning Handbook (pg.19)</li> </ul>
5	Systems that do not collect water use data must provide a schedule as to when acceptable data collection will occur during the next six years.	<ul style="list-style-type: none"> <li>– WAC 246-290-100(4)(d)(iii)</li> <li>– WAC 246-290-480(1)(e)(v), (2)(d), &amp; (2)(e)(v)</li> </ul>	<ul style="list-style-type: none"> <li>– MOU</li> <li>– Conservation Planning Requirements (pg.7)</li> <li>– Planning Handbook (pg.10)</li> </ul>

### Demand Forecasting

Item	Comment	Authority	Reference
1	Consecutive 6-year and 20-year water demand forecasts (for both Average Day Demand (ADD) and Maximum Day Demand (MDD)) must be provided.	<ul style="list-style-type: none"> <li>– WAC 246-290-100(4)(b)(ii) &amp; (4)(d)(ii)</li> <li>– WAC 246-290-221(1)</li> </ul>	<ul style="list-style-type: none"> <li>– MOU</li> <li>– Conservation Planning Requirements (pg.12)</li> <li>– Planning Handbook (pg. 12)</li> </ul>

## Conservation Program

Item	Comment	Authority	Reference
1	Include an evaluation that identifies the cost-effectiveness of conservation measures (as determined by the utility) and determine which conservation measures will be implemented. Provide details of analysis.	<ul style="list-style-type: none"> <li>– RCW 90.03.005</li> <li>– WAC 246-290-100(4)(d)(i)</li> </ul>	<ul style="list-style-type: none"> <li>– MOU</li> <li>– Conservation Planning Requirements (pg.4, 17)</li> <li>– Planning Handbook (pg.20)</li> </ul>
2	For each conservation program element chosen, describe how and when the element will be implemented. Measures must be in the Capital Improvement Program and financial program (if substantive).	<ul style="list-style-type: none"> <li>– WAC 246-290-100(4)(d)(i) &amp; (g)</li> </ul>	<ul style="list-style-type: none"> <li>– MOU</li> <li>– Conservation Planning Requirements (pg.5)</li> <li>– Planning Handbook (pg.20)</li> </ul>
3	Provide a copy of the system's rate structure. Provide an evaluation of the rate structure that looks at (1) the feasibility of adopting and implementing a rate structure that promotes water conservation, and (2) the affordability of water rates.	<ul style="list-style-type: none"> <li>– WAC 246-290-100(4)(d)(i), &amp; (4)(h)(iv)</li> </ul>	<ul style="list-style-type: none"> <li>– Conservation Planning Requirements (pg.15, 23)</li> <li>– Planning Handbook (pg.12, 69)</li> </ul>

## Municipal Water Supply—Efficiency Additional Requirements:

Item	Comment	Reference
1	Describe what, if any, previous efforts will be discontinued. For discontinued efforts, identify why continuation of these efforts would be ineffective or provide documentation that the discontinued program had a prescribed end date or savings level.	RCW 90.03.386, Section 7 (8)
2 > 1,000 conn.	Describe the projects, technologies, and other cost-effective measures that comprise the water conservation program.	RCW 90.03.386, Section 5 (3)(a)
3 > 1,000 conn.	Describe the improvements in the efficiency of water system use resulting from implementation of your water conservation program over the last six years.	RCW 90.03.386, Section 5 (3)(b)
4 > 1,000 conn. Inchoate Water	Provide a demand forecast for the next six years based on the water savings you expect from the planned conservation measures.	RCW 90.03.386, Section 5 (3)(c)
5 >1,000 conn. Inchoate Water	Provide a demand forecast for the next six years based on the water savings expected if implementing additional conservation measures that were considered cost-effective, but not chosen to be implemented.	RCW 90.03.386, Section 5 (3)(c)

## Recommended WSP Comments:

Item	Comment	Reference
1	The WSP checklists from the MOU for Water Use Data Collection, Demand Forecasting, and Water Conservation Planning Requirements should be completed and included in the plan.	<ul style="list-style-type: none"> <li>– MOU</li> <li>– Planning Handbook (pg.12)</li> </ul>
2	A 6-year and 20-year water demand forecast (for both ADD and MDD) should be provided which includes the changes in demand due to conservation savings.	<ul style="list-style-type: none"> <li>– MOU</li> <li>– Conservation Planning Requirements (pg.12)</li> <li>– Planning Handbook (pg.12)</li> </ul>
3	<p>Conservation program promotion should be implemented on an annual basis.</p> <p><b>Note:</b> Will be required if part of their past program unless considered ineffective or prescribed to end.</p>	<ul style="list-style-type: none"> <li>– MOU</li> <li>– Conservation Planning Requirements (pg.24)</li> <li>– Planning Handbook (pg.19)</li> </ul>
4	Please evaluate all of the recommended conservation measures (in the Conservation Planning Requirements) for your size system. If pursuing additional water rights in the next 20 years, as part of your source of supply analysis, evaluate all recommended measures from the next larger system size category.	<ul style="list-style-type: none"> <li>– MOU Attachment H</li> <li>– Conservation Planning Requirements (pg.16, 23)</li> <li>– Planning Handbook (pg.21)</li> </ul>